

**STEVE D. BYOUN, ESQ.** – Atty. ID# 005202000  
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Attorneys for Plaintiff,  
Our File No: 220338

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<b>C.V.,</b>	<b><u>COUNTERCLAIM FOR</u></b>
	<b><u>INTENTIONAL INFLICTION OF</u></b>
<b>Plaintiff,</b>	<b><u>EMOTIONAL DISTRESS</u></b>
<b>v.</b>	Case Action No.: 24-2096
<b>LAUREN CARMINUCCI a/k/a LAUREN GENSINGER,</b>	
<b>Defendant.</b>	
<b>LAUREN CARMINUCCI a/k/a LAUREN GENSINGER,</b>	
<b>Counterclaimant,</b>	
<b>v.</b>	
<b>C.V., JOHN DOE 1-20 (fictious names); JANE ROE 1-20 (fictious names),</b>	
<b>Counterclaim Defendants.</b>	

Defendant/ Counterclaimant, **LAUREN CARMINUCCI a/k/a LAUREN  
GENSINGER**, complaining of Defendant C.V., hereby alleges:

**FIRST CAUSE OF ACTION**  
**(Intentional Infliction of Emotional Distress)**

1. Defendant, C.V. has engaged in the intentional, extreme, reckless, and outrageous conduct of inflicting emotional distress through actions against Counterclaimant's person, livelihood and family.

2. Defendant, C.V., decided to intentionally and maliciously sue Counterclaimant with regards to Defendant's frivolous allegations.

3. Defendant, C.V. engaged in such behavior knowing that her decision to so would have irreversible, lifelong consequences for Counterclaimant, her unborn child and her mental wellbeing.

4. Defendant C.V.'s ultimate purpose in sharing misinformation and falsities about her falling out with Counterclaimant was to cause an uproar against Counterclaimant in such a manner as to elicit physical and emotional harm on Counterclaimant.

5. Defendant C.V. had prior knowledge of Counterclaimant's pregnancy and was aware that her actions would result in stress for the unborn child and mother. Defendant's intention was to inflict emotional distress on Counterclaimant through third parties.

6. Defendant C.V. knowingly used her influence to encourage third parties to make threats of physical violence against Counterclaimant. This conduct is beyond all bounds of decency and is to be regarded as atrocious, and utterly intolerable in a civilized community.

7. Defendant C.V. also knowingly threatened Counterclaimant with physical bodily harm, stating that she would go to her place of employment and physically assault her. Defendant C.V. was known to have previously threatened other third parties in their circles with physical harm and violence, elevating the fear and stress felt by Counterclaimant.

8. Any reasonable person, especially during a pregnancy, could not be expected to endure emotional distress inflicted by Defendant, C.V.'s encouragement of third parties' threats of physical violence against Counterclaimant. Such disregard for her pregnancy and mental well-being is so extreme and goes beyond all possible bounds of decency.

9. Defendant C.V. intended to cause severe emotional distress or recklessly disregarded the likelihood that such conduct would tend to cause severe emotional distress. Such outrageous behavior is beyond the limit of decency and is intolerable in a civilized society.

10. As a direct and proximate result of Defendant C.V.'s conduct, Counterclaimant suffered severe and irreversible emotional distress including but not limited to anxiety and post-traumatic stress disorder. As a result, Counterclaimant has been forced to seek psychiatric assistance.

WHEREFORE, Counterclaimant demands Judgment for intentional infliction of emotional duress, together with costs and attorney's fees, and any relief deemed just and proper.

FUSCO & MACALUSO PARTNERS, P.C.  
Attorneys for Counterclaimant

Dated:

By:

  
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STEVE D. BYOUN, ESQ.

**DEMAND FOR TRIAL BY JURY**

Pursuant to R. 4:35-1, Counterclaimant hereby demands trial by a jury of six (6) persons.

FUSCO & MACALUSO PARTNERS, P.C.  
Attorneys for Plaintiffs

Dated:

By:

  
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STEVE D. BYOUN, ESQ.

**DESIGNATION OF TRIAL COUNSEL**

In accordance with R. 4:25-4, Steve D. Byoun, Esq., is hereby designated as trial counsel for the Counterclaimant in the within matter.

FUSCO & MACALUSO PARTNERS, P.C.  
Attorneys for Plaintiffs

Dated:

By:

  
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STEVE D. BYOUN, ESQ.

**CERTIFICATION**

The undersigned hereby certifies that the matter in controversy is not now the subject of any other pending action in any court and is likewise not the subject of any pending arbitration proceeding. The Counterclaimant is not aware of any other parties or the true identities of other parties which should be joined in this action at this time.

FUSCO & MACALUSO PARTNERS, P.C.  
Attorneys for Plaintiffs

Dated:

By:

  
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STEVE D. BYOUN, ESQ.